

Joshua M. Sasaki, P.C., OSB No. 964182
josh.sasaki@millernash.com
MILLER NASH GRAHAM & DUNN LLP
3400 U.S. Bancorp Tower, 111 S.W. Fifth Ave
Portland, OR 97204
Telephone: 503.224.5858
Facsimile: 503.224.0155

Benjamin G. Shatz (pro hac vice)
bshatz@manatt.com
Christine M. Reilly (pro hac vice)
creilly@manatt.com
John W. McGuinness (pro hac vice)
jmcguinness@manatt.com
MANATT, PHELPS & PHILLIPS, LLP
2049 Century Park East, Suite 1700
Los Angeles, CA 90067
Telephone: 310.312.4000
Facsimile: 310.312.4224

Attorneys for Defendant
ViSalus, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

LORI WAKEFIELD, individually and on
behalf of all others similarly situated,

Plaintiff,

vs.

VISALUS, INC., a Nevada corporation,

Defendant.

No. CV No. 3:15-cv-01857-SI

**DEFENDANT'S UNOPPOSED MOTION
FOR AN EXTENSION OF TIME TO
OCTOBER 22 TO FILE OPPOSITIONS
TO PLAINTIFF'S (1) CLASS NOTICE
PROPOSAL AND (2) MOTION FOR
ATTORNEYS' FEES & INCENTIVE
AWARD**

LOCAL RULE 7-1 CERTIFICATION

Counsel for Defendant ViSalus conferred with Counsel for Plaintiff Wakefield, and Plaintiff's counsel consented to the extensions requested here.

MOTION FOR EXTENSIONS OF TIME

Currently pending are Plaintiff's motion for attorneys' fees and an incentive award (Dkt. 388; opposition due October 8, 2020) and Plaintiff's motion for approval of post-judgment notice plan and claims procedure (Dkt. 396). Oppositions to both motions were originally due October 9, 2020, but extended with consent to October 15 to allow the parties to attend mediation.

On October 15, ViSalus requested that Plaintiff agree to these extensions and Plaintiff's counsel so agreed.

Good cause exists for these extensions to allow ViSalus' counsel to address the numerous issues raised in Plaintiff's voluminous motions. These extensions will not impact other existing deadlines and are not sought for purposes of delay.

Respectfully submitted,

Dated: October 15, 2020

MANATT, PHELPS & PHILLIPS, LLP

By *s/Benjamin G. Shatz*

Christine M. Reilly (pro hac vice)

creilly@manatt.com

Benjamin G. Shatz (pro hac vice)

bshatz@manatt.com

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MILLER NASH GRAHAM & DUNN LLP

Joshua M. Sasaki, P.C., OSB No. 964182

josh.sasaki@millernash.com

Nicholas H. Pyle, OSB No. 165175

nicholas.pyle@millernash.com

Tel: 503.224.5858 Fax: 503.224.0155

Attorneys for Defendant ViSalus, Inc.

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